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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

IN THE MATTER OF THE

PEE PEE POP TRUST, PEE PEE POP
TRUST II, PEE PEE POP TRUST III, MAN
CUB TRUST, MAN CUB TRUST II, MAN
CUB TRUST III, DATED JULY 22, 2013.

Case No. 3:19-cv-00240-MMD-CBC

**[PROPOSED] STIPULATED
DISCOVERY PLAN AND
SCHEDULING ORDER**

**SUBMITTED IN COMPLIANCE
WITH LR 26-1(b)**

Pursuant to Fed. R. Civ. P. 26(f) and Local Rule 26-1, John Hurry, Trustee of Pee Pee Pop Trust, Pee Pee Pop Trust II, Pee Pee Pop Trust III, Man Cub Trust, Man Cub Trust II and Man Cub Trust III dated July 22, 2013, Alpine Securities Corporation, and Scottsdale Capital Advisors Corporation (“Corporations” and collectively “Petitioners”) and Respondent Financial Industry Regulatory Authority, Inc. (“FINRA”), submit this proposed Stipulated Discovery Plan and Scheduling Order in the above-referenced case.

A. Meet and Confer. Pursuant to Fed. R. Civ. P. 26(f) and Local Rule 26-1(a), a telephonic meeting will be held on August 5, 2019 between counsel for Petitioners and FINRA.

B. Initial Disclosures. The Parties stipulate and agree that the deadline to make initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1)(C) shall be **August 19, 2019**.

C. Discovery Plan.

1. Discovery Cut-Off Date. Pursuant to the telephonic status conference held on

1 August 5, 2019, the discovery cut-off date shall be **January 27, 2020**.

2 2. Amending the Pleadings and Adding Parties. The Parties shall be permitted to
3 amend pleadings or to add parties until **October 29, 2019**.

4 3. Expert Witnesses. The last day to disclose initial expert witnesses shall be
5 **November 27, 2019**. The last day to disclose rebuttal expert witnesses shall be **December 27,**
6 **2019**.

7 4. Pretrial Order. The deadline to file the joint pretrial order will be **March 27, 2020**.
8 The disclosures required by Fed. R. Civ. P. 26(a)(3) and Local Rule 16-4 shall be made in the
9 joint pretrial order.

10 5. Dispositive motions. FINRA filed a motion to dismiss on May 24, 2019 which is
11 fully briefed and submitted. Petitioners filed a motion to remand on June 10, 2019 which is fully
12 briefed and submitted. The deadline to file any further dispositive motions will be **February 27,**
13 **2020**.

14 6. Interim Status Report. Pursuant to LR 26-3, an interim status report must be filed
15 no later than 60 days before the discovery cut-off date. The deadline to file the interim status
16 report is **November 27, 2019**.

17 7. Trial Date. Per the Court's Order on Jul 27, 2019 a case management conference
18 will be held on January 27, 2010, and if dispositive motions are still pending, will discuss how
19 best to proceed.

20 **D. Other Items.**

21 1. Alternative Dispute Resolution. Pursuant to LR 26-1(b)(7), the Parties certify that they
22 discussed the possibility of using alternative dispute resolution.

23 2. Alternative Forms of Case Disposition. Pursuant to LR 26-1(b)(8), the Parties certify that
24 they considered consent to trial by a magistrate judge or use of the Short Trial Program.

25 3. Clawback Agreement. The inadvertent disclosure of documents shall be governed by
26 Federal Rule of Evidence 502 and Federal Rule of Civil Procedure 26(b)(5)(B).

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1
2 Dated: August 5, 2019

Dated: August 5 2019

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